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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOWER MANHATTAN DIALYSIS CENTER, INC.,
L-M DIALYSIS CORPORATION, LANTZ-MATALON
CHINATOWN ASSOCIATES, INC., and CHINATOWN
DIALYSIS CENTER, L.L.C.,

Plaintiffs,

07 Civ. 06903 (DLC)

- against -

JOHN P. LANTZ, M.D. and MARIE LANTZ,

**NOTICE OF MOTION
FOR REMAND FOR
LACK OF SUBJECT
MATTER JURISDICTION**

Defendants.
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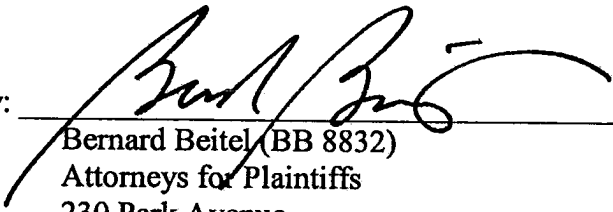
PLEASE TAKE NOTICE that upon the Declaration of Miriam Sinitzky, dated August 16, 2007 and the exhibits annexed thereto, the Declaration of Bernard Beitel, dated August 16, 2007 and the exhibits annexed thereto, including the Affidavit of Dang Dung Nguyen, M.D., and the accompanying Memorandum of Law, together with all the prior pleadings and proceedings had herein, Plaintiffs LOWER MANHATTAN DIALYSIS CENTER, INC., L-M DIALYSIS CORPORATION, LANTZ-MATALON CHINATOWN ASSOCIATES, INC. and CHINATOWN DIALYSIS CENTER, L.L.C. will move this Court before the Honorable Denise L. Cote, at the United States Court House located at 500 Pearl Street, New York, New York for an Order pursuant to 28 U.S.C. §1447(c) remanding this case to the Supreme Court of the State of New York, County of New York on the grounds of lack of subject matter jurisdiction and

directing Defendants and each of them to pay to Plaintiffs the actual costs and expenses (including attorneys' fees) that were incurred by Plaintiffs by reason of the removal, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
August 16, 2007

OTTERBOURG, STEINDLER, HOUSTON & ROSEN, P.C.

By: _____


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